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11 Attorneys for Plaintiff
12 *John Peterson*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 JOHN PETERSON, individually,

16 Plaintiff,

17 vs.

18 UNITED FINANCIAL CASUALTY
19 COMPANY; DOES I-V; and ROE
20 CORPORATIONS VI-X, inclusive,

21 Defendants.

CASE NO.: 2:22-cv-1509-JCM-NJK

22 **STIPULATION AND ORDER TO
EXTEND THE DEADLINE FOR
PLAINTIFF TO FILE HIS
RESPONSE TO DEFENDANT'S
MOTION FOR SUMMARY
JUDGMENT; MEMORANDUM OF
POINTS AND AUTHORITIES IN
SUPPORT THEREOF (ECF No.
40)**

(First Request)

23 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff JOHN
24 PETERSON, through his counsel of record, Dennis M. Prince and Kevin T. Strong of
25 PRINCE LAW GROUP and Craig W. Drummond and Liberty A. Pardee of
26 DRUMMOND LAW FIRM, and Defendant UNITED FINANCIAL CASUALTY
27 COMPANY, through its counsel of record, John T. Keating and Chatree M. Thongkham
28 of KEATING LAW GROUP, that the deadline for Plaintiff to file his Response to



1 Defendant's Motion for Summary Judgment; Memorandum of Points and Authorities in
 2 Support Thereof (ECF No. 40), shall be extended by eighteen (18) days, up to and
 3 including Tuesday, January 18, 2023. Plaintiff's Response is currently due on Friday,
 4 December 29, 2023. Defendant filed its Motion for Summary Judgment on December 8,
 5 2023. This is the parties' first request for an extension of time allowing Plaintiff to file
 6 his Response. This Stipulation and Order is submitted in accordance with LR IA 6-1.

7 The parties respectfully request this extension of time. Throughout the month of
 8 December, Plaintiff's undersigned counsel devoted substantial time and resources to
 9 prepare for oral argument before the Nevada Supreme Court in the matter styled
 10 *Sunrise Hospital and Medical Center, LLC v. Eighth Judicial District Court; Grace*,
 11 NVSC Case No. 85844. Oral argument occurred before the Nevada Supreme Court on
 12 December 19, 2023. In addition, Plaintiff's counsel of record, Dennis M. Prince,
 13 welcomed the birth of his child in December, which also required him to take some time
 14 away from the office. The parties' requested extension of time will allow Plaintiff to
 15 comprehensively and substantively respond to the numerous arguments Defendant sets
 forth in its Motion for Summary Judgment.

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1 Based on the foregoing, the parties respectfully request this Court to approve the
2 foregoing stipulation. The parties' requested extension is not made in bad faith or to
3 unnecessarily delay these proceedings.

4 DATED this 28th day of December, 2023.

5 DATED this 28th day of December, 2023.

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7 **PRINCE LAW GROUP**

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9 **KEATING LAW GROUP**

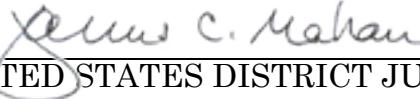
10 _____
11 */s/ Kevin T. Strong*
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20 _____
21 */s/ John T. Keating*
22 JOHN T. KEATING
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28 Las Vegas, Nevada 89148
Attorneys for Defendant

1 **ORDER**

2 **IT IS SO ORDERED.**

3 DATED December 29, 2023.

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7 UNITED STATES DISTRICT JUDGE

